

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RECLAIM THE RECORDS and ALEC
FERRETTI,

Plaintiffs,

- against -

UNITED STATES DEPARTMENT OF STATE,

Defendant.

NOTICE OF CROSS MOTION

No. 23-CV-1650 (JPC)

PLEASE TAKE NOTICE that upon the declaration of David B. Rankin of Beldock Levine & Hoffman, LLP, sworn to on March 28, 2024, the accompanying Memorandum of Law, and the declaration of Ron Schnell in support of Plaintiffs' Memorandum of Law, executed on March 26, 2024, the undersigned will request this Court located at Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007 at a time of the Court's convenience for an:

1. Order to produce the documents requested through Freedom of Information Act ("FOIA"), 5 U.S.C. §§552 *et seq.*, following Judgement pursuant to Fed. R. Civ. P. 56; and
2. Other such relief as the Court finds just and proper.

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Dated: March 28, 2024
New York, New York

Respectfully submitted,

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Attorneys for Plaintiff



By: _____

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